1	BRIAN J. STRETCH (CABN 163973) United States Attorney	
2		
.3	DAVID R. CALLAWAY (CABN 121782) Chief, Criminal Division	
4	ARVON J. PERTEET (CABN 242828) Assistant United States Attorney	
5		
6	San Francisco, California 94102-3495	
7	Telephone: (415) 436-6598 FAX: (415) 436-7234 Arvon.Perteet@usdoj.gov	
8	Attorneys for United States of America	
9	Attorneys for Office States of America	
10	UNITED STATES DISTRICT COURT	
11	NORTHERN DISTRICT OF CALIFORNIA	
12	SAN FRANCISCO DIVISION	
13	UNITED STATES OF AMERICA,	No. CV 12-03567 MEJ
14		
15	Plaintiff,) STIPULATION TO DISMISS ACTION) PURSUANT TO RULE 41(a)(1)(A)(ii)
16	V.) '
17	REAL PROPERTY AND IMPROVEMENTS LOCATED AT 1840 EMBARCADERO,	
18	OAKLAND, CALIFORNIA,))
19	Defendant.	
20	Pursuant to Federal Rule of Civil Procedu	are 41(a)(1)(A)(ii), and by the signatures of their
21	counsel hereunder, plaintiff United States of Ame	erica and claimants, Ana Chretien, Summit Bank,
22	Patients Mutual Assistance Collective Corporation ("PMACC"), Cornelia Crunseth, Frank Knighten,	
23	Atour Jason David, Desiree Monique Firl ("Claimants") hereby submit this stipulation to dismiss the	
24	government's Verified Complaint for Forfeiture with prejudice. Claimants will and hereby do release	
25	the United States of America, its agencies, agents, and officers, including employees and agents of the	
26	Drug Enforcement Administration ("DEA"), from any and all claims, actions or liabilities arising out of	
27	or related to this civil forfeiture action, including,	without limitation, any claim for attorneys' fees, cost
28	or interest which may be asserted on behalf of Cl	aimants against the United States, whether pursuant to
	STIP DISMISSAL	

CV 12-03567 MEJ

		1-tod to	
	28 U.S.C. § 2465 or otherwise. Claimants further agree to waive all appellate rights if any, related to		
	S.C. § 2405 of Older	against each	
ll l	civil action. This crimulation shall not be deer	med to affect any rights or claims of Claimants as against each	
3			
4 other	er. ed: April 27, 2016	BRIAN J. STRETCH United States Attorney	
	ed: April 21, 2010		
6		ARVON J. PERVEET, AUSA	
7		Attorney for Plaintiff, United States of America	
8			
9 10 Da	ated: April_, 2016	HENRY G. WYKOWSKI Attorney for Claimant PMACC	
11			
12 D	pated: April_, 2016	STEPHEN R. DEANGELO for Claimant PMACC	
13		for Claimant 1 William	
14			
15 I	Dated: April, 2016	JOSEPH ELFORD Attorney for Patient Claimants	
16		Attorney for Fatters	
17	Dated: April, 2016	CORNELIA CRUNSETH	
18	Dated. April, 2010	Patient Claimant	
19			
20	Dated: April, 2016	FRANK KNIGHTEN Patient Claimant	
21		Patient Claimant	
22	Dated: April, 2016	ATOUR JASON DAVID	
23	Datou. Tsp	Patient Claimant	
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25	Dated: April, 2016	DESIREE MONIQUE FIRL Patient Claimant	
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i	28 U.S.C. § 2465 or otherwise. Claimants further	agree to waive all appellate rights if any, related to
2	this civil action.	
3	This stipulation shall not be deemed to affe	ct any rights or claims of Claimants as against each
4	other.	
5	Dated: April 27, 2016	BRIAN J. STRETCH United States Attorney
6		emod sudo suomoj
7		ARVON J. PERTEET. AUSA
8		ARVON J. PERTEET, AUSA Attorney for Plaintiff, United States of America
9	267076	24/1/
10	Dated: April 6, 2016	HENRYG. WIKOWSKI
11		Attorney for Claimant PMACC
12	Dated: April 29, 2016	2Chal
13		STEPHEN R. DEANGELO for Claimant PMACC
14	Mari Q	
15	May 9 Dated: April_, 2016	J. Edgs
16		JOSEPH ELFORD Attorney for Patient Claimants
17		
18		CORNELIA CRUNSETH Patient Claimant
19		The Community
20	Dated: April, 2016	FRANK KNIGHTEN
21 22		Patient Claimant
23	Dated: April, 2016	
24	,	ATOUR JASON DAVID Patient Claimant
25		
26	Dated: April, 2016	DESIREE MONIQUE FIRL
27		Patient Claimant
28	s ^a	
	STIP DISMISSAL CV 12-03567 MEJ	

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4	other.			
5 6		BRIAN J. STRETCH United States Attorney		
7 8 9		ARVON J. PERTEET, AUSA Attorney for Plaintiff, United States of America		
10 11	Dated: April_, 2016	HENRY G. WYKOWSKI Attorney for Claimant PMACC		
12 13	Dated: April, 2016	STEPHEN R. DEANGELO for Claimant PMACC		
14 15 16	Dated: April, 2016	JOSEPH ELFORD Attorney for Patient Claimants		
17 18 19	Decede April 2016	CORNELIA CRUNSETH Patient Claiman		
20 21 22	Dated: April, 2016	FRANK KNIGHTEN Patient Claimant		
23 24	Dated: April, 2016	ATOUR JASON DAVID Patient Claimant		
25 26	Dated: April, 2016	DESIREE MONIQUE FIRL Patient Claimant		
27 28		1986 :		
	STIP DISMISSAL CV 12-03567 MEJ			

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2	this civil action.	
3	This stipulation shall not be deemed to aft	fect any rights or claims of Claimants as against each
4	other.	
5	Dated: April 27, 2016	BRIAN J. STRETCH United States Attorney
6		Office Sales Morney
7		ARVON J. PERTEET, AUSA
8		Attorney for Plaintiff, United States of America
9	D-t-1 A9 2016	
10	Dated: April_, 2016	HENRY G. WYKOWSKI Attorney for Claimant PMACC
11		Autority for Claumant I MACC
12	Dated: April, 2016	STEPHEN R. DEANGELO
13		for Claimant PMACC
14		
15 16	Dated: April, 2016	JOSEPH ELFORD
17	·	Attorney for Patient Claimants
18	Dated: April, 2016	
19		CORNELIA CRUNSETH Patient Claimant
20		2 2114
21	Dated: April, 2016	FRANK KNIGHTEN
22		Patient Claimant
23	Dated: April, 2016	ATOUR JASON DAVID
24		Patient Claimant
25	Dated: April , 2016	
26	Dated. 74pm, 2010	DESIREE MONIQUE FIRL Patient Claimant
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3	This stipulation shall not be deemed to	o affect any rights or claims of Claimants as against each
4	other.	
5	Dated: April 27, 2016	BRIAN J. STRETCH
6		United States Attorney
7		ARVON J. PERTEET, AUSA
8		Attorney for Plaintiff, United States of America
-9		
10	Dated: April_, 2016	HENRY G. WYKOWSKI
11		Attorney for Claimant PMACC
12	Dated: April, 2016	
13		STEPHEN R. DEANGELO for Claimant PMACC
14		
15	Dated: April, 2016	TOURNAL PAR FOR D
16		JOSEPH ELFORD Attorney for Patient Claimants
17	D. 1. 1. 1. 7. 2016	
18	Dated: April, 2016	CORNELIA CRUNSETH Patient Claimant
19		ranchi Cammani
20	Dated: April, 2016	FRANK KNIGHTEN
21		Patient Claimant
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23		ATOUR JASON DAVID Patient Claimant
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26	Dated: April, 2016	DESIREE MONIQUE FIRL
27		Patient Claimant
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4	4 other.		
5	5 Dated: April 27, 2016 BRIAN J. STRETCH United States Attorne		
6		,	
7	ARVON J. PERTEET	, AUSA	
8		rica	
9			
10	HENRI G. WIKOW		
11	Attorney for Claimant	PMACC	
12	Dated: April , 2016	-	
13	STEPHEN R. DEANG for Claimant PMACC	ELO	
14	14		
15	pated: April , 2010		
16	Attorney for Patient C	laimants	
17	Details April 2016		
18	II CORNELIA CRUNSI	ETH	
19	Patient Claimant		
20	[Dated: April, 2016		
21	Patient Claimant		
22	David A. St. 1994		
23	ATOUR JASON DAY	VID.	
24	~		
25	Dated: April, 2016	FIRE	
26	Patient Claimant	TIRL	
27	 		
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1	Dated: April, 2016	
2		STEVEN PISER
3		Attorney for Claimant Summit Bank
4	Dotody April 2017	
i de la companya de	Dated: April, 2016	
5		Representative for Claimant Summit Bank
6	Dated: April 2016	The state of the s
7	Dated: April 2016	RICHARD TAMOR
8		Attorney for Claimant Ana Chretien
The second secon	Dated: April, 2016	
10		ANA CHRETIEN Claimant Property Property Owner
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1 2 3 4 5	Dated: April, 2016 Dated: April, 2016 Dated: April, 2016	STEVEN PISER Attorney for Claimant Summit Bank Mull Representative for Claimant Summit Bank
-8		RICHARD TAMOR Attorney for Claimant Ana Chretien
9	Dated: April, 2016	
10		ANA CHRETIEN Claimant Property Property Owner
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